

Worksheet
Documentation of Land Use Plan Conformance and Determination of NEPA Adequacy (DNA)

U.S. Department of the Interior
Utah Bureau of Land Management (BLM)

The signed CONCLUSION at the end of this worksheet is part of an interim step in the BLM's internal analysis process and does not constitute an appealable decision; however, it constitutes an administrative record to be provided as evidence in protest, appeals and legal procedures.

A. BLM Office: Price Field Office (UT-070)

Proposed Action Title: February 26, 2006 competitive Oil and Gas Lease Sale

Location of Proposed Action: Parcels within Carbon and Emery County, Utah. *Appendix A* contains legal descriptions for each parcel.

Description of the Proposed Action: The Utah State Office proposes to offer 173 parcels of land in Carbon and Emery Counties, Utah administered by the Price Field Office for oil and gas leasing in a competitive lease sale to be held on February 21, 2006. Due to coal conflicts, six of these parcels should be removed from competitive lease sale (described below). Also, due to a pending IBLA decision on Price River Management Framework (MFP) parcels, 102 parcels should be removed from this sale. Thus 65 parcels were fully reviewed for NEPA adequacy and are discussed in detail in this DNA. All 65 parcels are located in Emery County, Utah. *Appendix A* lists all parcels including special lease stipulations. These parcels include public lands or lands in which the mineral estate is administered by the BLM. If a parcel of land is not purchased at the lease sale by competitive bidding, it may still be leased within two years after the initial offering under a current review of NEPA adequacy. A lease may be held for ten years, after which the lease expires unless oil or gas is produced in paying quantities. A producing lease can be held indefinitely by economic production.

Planning decisions place certain lands in a no leasing category. Most lands are leased with minor stipulations attached to the lease from the appropriate land use plan for the area. Some lands are leased with limited areas of no surface occupancy within the lease boundaries. Some lands are leased with no stipulations other than those found on the standard lease contract form. A lease grants the right to drill for oil and gas, at some location on the lease.

A lessee must submit an Application for Permit to Drill (APD) (Form 3160-3) to the BLM for approval and must possess an approved APD prior to any surface disturbance in preparation for drilling. Any stipulations attached to the standard lease form must be complied before an APD may be approved. Following BLM approval of an APD, a lessee may produce oil and gas from the well in a manner approved by BLM in the APD or in subsequent sundry notices. The operator must notify the appropriate authorized officer, 48 hours before starting any surface disturbing activity approved in the APD.

The Price Field Office recommends that the following parcels be removed from the sale because they are located on active coal leases, or have conflicts with coal mining-related activities. As such, they were not reviewed under this DNA.

- **UT0206-030:** Active Coal Lease per Utah State Office (Price River MFP).
- **UT0206-049:** Active coal Lease. Coal Lease Number SL-051279, Soldier Creek Mine (Price

- River MFP).
- **UT0206-077:** Active Coal Lease. Coal lease Number SL-068754, West Ridge Mine (Price River MFP).
 - **UT0206-078:** Active Coal Lease. Coal lease numbers UTU-78562 and SL-068754, West Ridge Mine (Price River MFP).
 - **UT0206-079:** Active Coal Lease Coal lease number SL-068754 West Ridge Mine (Price River MFP).
 - **UT0206-131:** Active coal lease. Coal lease numbers SL-069291 & U-014217 Lila/Horse Canyon Mine (Price River MFP).

The Price Field Office did review all of the parcels located within the Price River MFP listed in the February 2006 oil and gas lease sale for NEPA adequacy and the specialists' reports are attached. The parcels listed below are located within lands managed under the Price River Management Framework Plan (MFP). This document outlines the following objective (Mineral M-1) for the mineral estates, "Allow and encourage development of those leasable minerals known to occur within the planning area in accordance with current laws and regulations so as to aid in filling the local and national energy requirements. On August 16, 2005, BLM received an adverse decision in Southern Utah Wilderness Alliance 166 IBLA 270, finding BLM's NEPA analysis insufficient for ten parcels offered under the Price River MFP and the 1988 EA Supplement on Cumulative Impacts on Oil and Gas Lease Categories, Price River Resource Area. BLM moved for reconsideration on October 18, 2005. Parcels within the MFP are deferred until the Board rules on the motion for reconsideration. This DNA does not address these parcels any further.

UT0206-031	UT0206-059	UT0206-093	UT0206-135
UT0206-033	UT0206-060	UT0206-094	UT0206-136
UT0206-034	UT0206-061	UT0206-095	UT0206-137
UT0206-035	UT0206-062	UT0206-096	UT0206-138
UT0206-036	UT0206-063	UT0206-097	UT0206-139
UT0206-037	UT0206-069	UT0206-098	UT0206-140
UT0206-038	UT0206-070	UT0206-099	UT0206-141
UT0206-039	UT0206-071	UT0206-115	UT0206-142
UT0206-040	UT0206-072	UT0206-116	UT0206-161
UT0206-041	UT0206-073	UT0206-117	UT0206-162
UT0206-042	UT0206-074	UT0206-118	UT0206-163
UT0206-043	UT0206-075	UT0206-119	UT0206-164
UT0206-044	UT0206-076	UT0206-120	UT0206-165
UT0206-045	UT0206-080	UT0206-121	UT0206-166
UT0206-046	UT0206-081	UT0206-122	UT0206-167
UT0206-047	UT0206-082	UT0206-123	UT0206-168
UT0206-048	UT0206-083	UT0206-124	UT0206-190
UT0206-050	UT0206-084	UT0206-125	UT0206-191
UT0206-051	UT0206-085	UT0206-126	UT0206-192
UT0206-052	UT0206-086	UT0206-127	UT0206-193
UT0206-053	UT0206-087	UT0206-128	UT0206-194
UT0206-054	UT0206-088	UT0206-129	UT0206-195
UT0206-055	UT0206-089	UT0206-130	UT0206-196
UT0206-056	UT0206-090	UT0206-132	UT0206-216
UT0206-057	UT0206-091	UT0206-133	
UT0206-058	UT0206-092	UT0206-134	

B. Conformance with the Land Use Plan (LUP) and Consistency with Related Subordinate Implementation Plans

- Price River Management Framework Plan, September 2, 1983
- Price River Management Framework Plan Supplement, August 13, 1984
- San Rafael Resource Management Plan, May 24, 1991
- Range Valley Habitat Management Plan, 1991
- Range Creek Wild Horse Management Area Plan, May 9, 1994
- Nine Mile Canyon Special Recreation and Cultural Management Area Activity Plan, January 4, 1995

The proposed action is in conformance with the applicable LUPs because it is specifically provided for in the following LUP decisions:

Price River Management Framework Plan (MFP) Minerals M-1: Allow and encourage development of those Leasable minerals known to occur within the planning area in accordance with current laws and regulations so as to aid in filling the local and national energy requirements.

San Rafael Resource Management Plan (RMP) (page 11): To lease public lands for oil and gas...only so long as RMP goals are met; and to administer operational aspects of federal oil and gas leases where BLM does not manage the surface.

The Oil and Gas Category plats of the Price River MFP and the San Rafael RMP identify the stipulations to be attached to each lease or portion thereof.

C. Identify the applicable NEPA document(s) and other related documents that cover the proposed action.

- Price District Oil and Gas Environmental Analysis Record, August 15, 1975
- EA Supplement on Cumulative Impacts on Oil and Gas Lease Categories, San Rafael Resource Area, December 20, 1988
- EA Supplement on Cumulative Impacts on Oil and Gas Lease Categories, Price River Resource Area, December 23, 1988
- San Rafael Resource Management Plan Final Environmental Impact Statement, May 24, 1991
- Castlegate Coalbed Methane Project Carbon County Utah, October 1992
- Price Coalbed Methane Project Final Environmental Impact Statement, May 1997
- Ferron Natural Gas Project Final Environmental Impact Statement, July 6, 1999
- Price Resource Management Plan Draft Environmental Impact Statement, July 2004

D. NEPA Adequacy Criteria

- 1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed?**

Item 1: Yes for the following parcels:

UT0206-100	UT0206-150	UT0206-176	UT0206-201
UT0206-101	UT0206-151	UT0206-177	UT0206-202
UT0206-102	UT0206-152	UT0206-178	UT0206-203
UT0206-103	UT0206-153	UT0206-179	UT0206-204
UT0206-104	UT0206-154	UT0206-180	UT0206-205
UT0206-105	UT0206-155	UT0206-181	UT0206-206
UT0206-106	UT0206-156	UT0206-182	UT0206-207
UT0206-107	UT0206-157	UT0206-183	UT0206-208
UT0206-108	UT0206-158	UT0206-184	UT0206-209
UT0206-109	UT0206-159	UT0206-185	UT0206-210
UT0206-143	UT0206-169	UT0206-186	UT0206-211
UT0206-144	UT0206-170	UT0206-187	UT0206-212
UT0206-145	UT0206-171	UT0206-188	UT0206-213
UT0206-146	UT0206-172	UT0206-197	UT0206-214
UT0206-147	UT0206-173	UT0206-198	
UT0206-148	UT0206-174	UT0206-199	
UT0206-149	UT0206-175	UT0206-200	

Item 1: Rationale for "Yes": The Price District Oil and Gas Environmental Analysis Record, the Environmental Assessment (EA) Supplement on Cumulative Impacts on Oil and Gas Leasing Categories for Price River Resource Area and the EA Supplement on Cumulative Impacts on Oil and Gas Leasing Categories for the San Rafael Resource Area (together referred to as the 1988 EA Supplements) analyzed the leasing of parcels for development of mineral resources. The San Rafael Resource Management Plan Final Environmental Impact Statement (EIS) also proposed leasing for oil and gas development stating, "To lease public lands for oil and gas... only so long as RMP goals are met; and to administer operational aspects of federal oil and gas leases where BLM does not manage the surface."

Item 1: No for the following parcels: None

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current proposed action, given current environmental concerns, interests, resource values, and circumstances?

Item 2: Yes for the following parcels:

UT0206-100	UT0206-143	UT0206-153	UT0206-172
UT0206-101	UT0206-144	UT0206-154	UT0206-173
UT0206-102	UT0206-145	UT0206-155	UT0206-174
UT0206-103	UT0206-146	UT0206-156	UT0206-175
UT0206-104	UT0206-147	UT0206-157	UT0206-176
UT0206-105	UT0206-148	UT0206-158	UT0206-177
UT0206-106	UT0206-149	UT0206-159	UT0206-178
UT0206-107	UT0206-150	UT0206-169	UT0206-179
UT0206-108	UT0206-151	UT0206-170	UT0206-180
UT0206-109	UT0206-152	UT0206-171	UT0206-181

UT0206-182	UT0206-197	UT0206-204	UT0206-211
UT0206-183	UT0206-198	UT0206-205	UT0206-212
UT0206-184	UT0206-199	UT0206-206	UT0206-213
UT0206-185	UT0206-200	UT0206-207	UT0206-214
UT0206-186	UT0206-201	UT0206-208	
UT0206-187	UT0206-202	UT0206-209	
UT0206-188	UT0206-203	UT0206-210	

Item 2: Rationale for "Yes": The range of alternatives in the Price District Oil and Gas Environmental Analysis Record, the 1988 EA Supplements, and the San Rafael RMP are appropriate. Analysis of this range of alternatives would respond to any concerns and interests and provide an alternative for protection of any resource values that may be affected by the current proposal. Issues, concerns, interests and resource values identified and analyzed in the above documents and the related NEPA documents identified in section C of this DNA, and their relevance to the proposed leasing, are discussed under Criteria 3 and 5.

Item 2: No for the following parcels: None

3. Is existing analysis adequate in light of any new information or circumstances (including, for example, riparian proper functioning condition [PFC] reports; rangeland health standards assessments; Unified Watershed Assessment categorizations; inventory and monitoring data; most recent U.S. Fish and Wildlife Service lists of threatened, endangered, proposed, and candidate species; most recent BLM lists of sensitive species)? Can you reasonably conclude that all new information and all new circumstances are insignificant with regard to analysis of the proposed action?

Item 3: Yes for the following parcels:

UT0206-100	UT0206-149	UT0206-174	UT0206-199
UT0206-101	UT0206-150	UT0206-175	UT0206-200
UT0206-102	UT0206-151	UT0206-176	UT0206-202
UT0206-103	UT0206-152	UT0206-177	UT0206-203
UT0206-104	UT0206-153	UT0206-178	UT0206-205
UT0206-105	UT0206-154	UT0206-179	UT0206-206
UT0206-106	UT0206-155	UT0206-180	UT0206-207
UT0206-107	UT0206-156	UT0206-181	UT0206-208
UT0206-108	UT0206-157	UT0206-182	UT0206-209
UT0206-109	UT0206-158	UT0206-183	UT0206-210
UT0206-143	UT0206-159	UT0206-184	UT0206-211
UT0206-144	UT0206-169	UT0206-185	UT0206-212
UT0206-145	UT0206-170	UT0206-186	UT0206-213
UT0206-146	UT0206-171	UT0206-187	UT0206-214
UT0206-147	UT0206-172	UT0206-188	
UT0206-148	UT0206-173	UT0206-198	

Item 3: Rationale for "Yes": The Price District Oil and Gas Environmental Analysis Record, the 1988 EA Supplements, and the San Rafael RMP Final EIS describe the resource values that could be affected by the proposed leasing. Since the publication of these NEPA documents, environmental justice, ground

water quality, Native American Religious Concerns, and noxious weeds have been added to the list of critical elements of the human environment. Ground water quality for the land proposed for lease was analyzed in the original planning documents.

The Price Field Office reviewed the parcels included in the February 16, 2006 lease sale to identify their potential for cultural resources and Native American religious concerns and the impacts leasing would have on these resources. On November 1, 2005, certified consultation letters (attached to the cultural staff report) were sent to the following Tribes: Southern Ute, Navajo, Shoshone-Wyoming, Hopi, Goshute, Zuni, Uintah and Ouray Ute, Ute Mountain Ute, Northwestern Band of the Shoshone, Shoshone-Bannock, and Paiute. The letters requested comments to be provided to the PFO within 30 days up receipt of the letter (December 15, 2005). As of December 9, 2005, no concerns pertaining to leasing of the preliminary parcels have been received. If any concerns are raised by the tribes, those concerns will be addressed. Consultation will be considered complete if tribal response presents no objections or if response is not received by December 15, 2005.

With regards to review of the lease parcels for cultural resources, most of the previous inventories are over twenty years old and were made at a different standard than today. Additional sites are expected to exist that were not recorded. The existing inventories and others surrounding these parcels are sufficient to determine that historic properties are likely to be present on each proposed lease parcel.

It is submitted that this oil and gas lease undertaking falls under the purview of the Protocol negotiated between BLM and the Utah State Historic Preservation Office, a document designed to assist BLM in meeting its responsibilities under the National Historic Preservation Act, various implementing regulations, and the National Cultural Programmatic Agreement. Further, the view taken here is that the undertaking does not exceed any of the review thresholds listed in Part VII (A) of the Protocol, and that it may be viewed as a No Historic Properties Affected; eligible sites present, but not affected as defined by 36CFR800.4 [VII (A) C (4)].

To assure appropriate consideration of future effects from the February 16, 2006 lease sale, the BLM will add the following "lease stipulation" (WO-IM-2005-003), to all parcels offered for lease.

"This lease may be found to contain historic properties and/or resources protected under the National Historic Preservation Act (NHPA), American Indian Religious Freedom Act, Native American Graves Protection and Repatriation Act, E.O. 13007, or other statutes and executive orders. The BLM will not approve any ground disturbing activities that may affect any such properties or resources until it completes its obligations under applicable requirements of the NHPA and other authorities. The BLM may require modification to exploration, or development proposals to protect such properties, or disapprove any activity that is likely to result in adverse effects that cannot be successfully avoided, minimized or mitigated." WO-IM 2005-03

Item 3: No for the following parcels:

UT0206-197
UT0206-201
UT0206-204

Item 3: Rationale for "No": Portions of parcel UT0206-197, UT0206-201, UT0206-204, managed under the San Rafael RMP and located within the area proposed as suitable for wild and scenic river status where special management prescriptions are proposed in the preferred alternative for the Price RMP Draft EIS.

4. Do the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current proposed action?

Item 4: Yes for the following parcels:

UT0206-100	UT0206-150	UT0206-175	
UT0206-101	UT0206-151	UT0206-176	UT0206-200
UT0206-102	UT0206-152	UT0206-177	UT0206-202
UT0206-103	UT0206-153	UT0206-178	UT0206-203
UT0206-104	UT0206-154	UT0206-179	UT0206-205
UT0206-105	UT0206-155	UT0206-180	UT0206-206
UT0206-106	UT0206-156	UT0206-181	UT0206-207
UT0206-107	UT0206-157	UT0206-182	UT0206-208
UT0206-108	UT0206-158	UT0206-183	UT0206-209
UT0206-109	UT0206-159	UT0206-184	UT0206-210
UT0206-143	UT0206-169	UT0206-185	UT0206-211
UT0206-144	UT0206-170	UT0206-186	UT0206-212
UT0206-145	UT0206-171	UT0206-187	UT0206-213
UT0206-147	UT0206-172	UT0206-188	UT0206-214
UT0206-148	UT0206-173	UT0206-198	
UT0206-149	UT0206-174	UT0206-199	

Item 4: Rationale for "Yes": The methodology and approach used in the Price District Oil and Gas Environmental Analysis Record, the 1988 EA Supplements, and the San Rafael RMP Final EIS are appropriate for the current proposed action because the methods of extraction, land requirements for exploration and development, and potential impacts have not changed substantially since completion of these documents. The basic analysis assumptions included in these documents are still applicable to the current proposal. Coal bed methane production in Utah is essentially the same as conventional gas development as water production is injected below surface, therefore the methods of extraction, land requirements for exploration and development and potential impacts have not changed substantially.

Item 4: No for the following parcels within San Rafael RMP:

UT0206-197
UT0206-201
UT0206-204

Item 4: Rational for "No": The above parcels are located in along the Green River, which is an area characterized by steep slopes and deep canyons. The number of suitable locations for oil and gas development is very limited. The Price District Oil and Gas Environmental Analysis Record and the 1988 EA Supplement for the Price River MFP did not analyze in great detail the use of directional drilling. When the 1975 EAR was analyzed, directional drilling was a new technology and very costly. Today however directional drilling is a very feasible alternative to vertical drilling thus the analytical approach used in the current documents is not adequate anymore.

5. Are the direct and indirect impacts of the current proposed action substantially unchanged from those identified in the existing NEPA document(s)? Do the existing NEPA documents analyze impacts related to

the current proposed action at a level of specificity appropriate to the proposal (plan level, programmatic level, project level)?

Item 5: Yes for the following parcels:

UT0206-100	UT0206-149	UT0206-174	UT0206-199
UT0206-101	UT0206-150	UT0206-175	UT0206-200
UT0206-102	UT0206-151	UT0206-176	UT0206-202
UT0206-103	UT0206-152	UT0206-177	UT0206-203
UT0206-104	UT0206-153	UT0206-178	UT0206-205
UT0206-105	UT0206-154	UT0206-179	UT0206-206
UT0206-106	UT0206-155	UT0206-180	UT0206-207
UT0206-107	UT0206-156	UT0206-181	UT0206-208
UT0206-108	UT0206-157	UT0206-182	UT0206-209
UT0206-109	UT0206-158	UT0206-183	UT0206-210
UT0206-143	UT0206-159	UT0206-184	UT0206-211
UT0206-144	UT0206-169	UT0206-185	UT0206-212
UT0206-145	UT0206-170	UT0206-186	UT0206-213
UT0206-146	UT0206-171	UT0206-187	UT0206-214
UT0206-147	UT0206-172	UT0206-188	
UT0206-148	UT0206-173	UT0206-198	

Item 5: Rationale for “Yes”: The Price District Oil and Gas Environmental Analysis Record and San Rafael RMP Final EIS evaluated the direct and indirect impacts of oil and gas leasing per the current leasing categories, whether open to leasing, open to leasing with special stipulations or otherwise. As identified under criterion 3, no significant new information or circumstances have been identified which would render the existing analyses inadequate for leasing the above parcels. Nor have the existing resource conditions and other elements of the human environment changed substantially from those evaluated in the existing documents.

Coalbed methane production was not reasonably foreseeable when the planning documents were prepared. However, coalbed methane production in Utah is essentially the same as conventional gas development as water production is injected below surface; therefore there is no change to the existing resource conditions and values.

Natural gas production from tar sand deposits was not reasonably foreseeable when the planning documents were prepared. However, natural gas production from tar sands is essentially the same as conventional gas development; therefore there is no change to the existing resource conditions and values.

Item 5: No for the following parcels:

UT0206-197
UT0206-201
UT0206-204

Item 5: Rational for “No”: The above parcels are located along a stretch of the Green River which is proposed as suitable for wild and scenic river status in the Price draft RMP EIS. The direct and indirect effects of the change in leasing categories and possible special designations in the area have not been analyzed in previous NEPA documents.

6. Can you conclude without additional analysis or information that the cumulative impacts that would result from implementation of the current proposed action are substantially unchanged from those analyzed in the existing NEPA document(s)?

Item 6: Yes for the following parcels:

UT0206-100	UT0206-150	UT0206-176	UT0206-194
UT0206-101	UT0206-151	UT0206-177	UT0206-198
UT0206-102	UT0206-152	UT0206-178	UT0206-199
UT0206-103	UT0206-153	UT0206-179	UT0206-200
UT0206-104	UT0206-154	UT0206-180	UT0206-202
UT0206-105	UT0206-155	UT0206-181	UT0206-203
UT0206-106	UT0206-156	UT0206-182	UT0206-205
UT0206-107	UT0206-157	UT0206-183	UT0206-206
UT0206-108	UT0206-158	UT0206-184	UT0206-207
UT0206-109	UT0206-159	UT0206-185	UT0206-208
UT0206-143	UT0206-169	UT0206-186	UT0206-209
UT0206-144	UT0206-170	UT0206-187	UT0206-210
UT0206-145	UT0206-171	UT0206-188	UT0206-211
UT0206-146	UT0206-172	UT0206-190	UT0206-212
UT0206-147	UT0206-173	UT0206-191	UT0206-213
UT0206-148	UT0206-174	UT0206-192	UT0206-214
UT0206-149	UT0206-175	UT0206-193	

Item 6: Rationale for "Yes": The cumulative impacts of the oil and gas including coalbed methane development have been analyzed in Castlegate Coalbed Methane Project, Price Coalbed Methane Project, and Ferron Natural Gas Project EISs. The EISs update the development scenario addressed the 1988 EA Supplements. The Ferron Natural Gas Project EIS, the last to be completed, addressed the cumulative impacts of all three actions. Therefore the cumulative impacts of coalbed methane and conventional oil and gas activities have been analyzed in full.

Coalbed methane production was not reasonably foreseeable when the planning documents were prepared. However, coalbed methane production in Utah is essentially the same as conventional gas development as water production is injected below surface; therefore there is no change to the existing resource conditions and values.

Natural gas production from tar sands is essentially the same as conventional natural gas production. Because the areas have been analyzed for surface disturbance related to conventional natural gas and coalbed methane production, the cumulative impacts have been analyzed in full.

Item 6: No for the following parcels:

UT0206-197
UT0206-201
UT0206-204

Item 6: Rational for "No": The above parcels are located along a stretch of the Green River which is proposed as suitable for wild and scenic river status in the Price draft RMP EIS. The cumulative effects of

the change in leasing categories and possible special designations in the area have not been analyzed in previous NEPA documents.

7. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?

Item 7: Yes for the following parcels:

UT0206-100	UT0206-151	UT0206-179	UT0206-206
UT0206-101	UT0206-152	UT0206-180	UT0206-207
UT0206-102	UT0206-153	UT0206-181	UT0206-208
UT0206-103	UT0206-154	UT0206-182	UT0206-209
UT0206-104	UT0206-155	UT0206-183	UT0206-210
UT0206-105	UT0206-156	UT0206-184	UT0206-211
UT0206-106	UT0206-157	UT0206-185	UT0206-212
UT0206-107	UT0206-158	UT0206-186	UT0206-213
UT0206-108	UT0206-159	UT0206-187	UT0206-214
UT0206-109	UT0206-169	UT0206-188	
UT0206-143	UT0206-170	UT0206-197	
UT0206-144	UT0206-171	UT0206-198	
UT0206-145	UT0206-172	UT0206-199	
UT0206-146	UT0206-173	UT0206-200	
UT0206-147	UT0206-174	UT0206-201	
UT0206-148	UT0206-175	UT0206-202	
UT0206-149	UT0206-176	UT0206-203	
UT0206-150	UT0206-177	UT0206-204	
	UT0206-178	UT0206-205	

Item 7: Rational for "Yes": The public involvement and interagency review procedures and findings made through the development of the Price River MFP, the Price River MFP Supplement approved August 13, 1984, and the Environmental Assessment Supplement on Cumulative Impacts on Oil and Gas Leasing Categories for the Price River Resource Area approved on December 23, 1988, the Environmental Assessment Supplement on Cumulative Impacts on Oil and Gas Leasing Categories for the San Rafael Resource Area approved on December 20, 1988, and the San Rafael Resource Management Plan approved May 24, 1991 are adequate for the proposed lease sale. A public meeting was held in Price on April 18, 1983. A Federal Register Notice concerning the preparation and availability was posted on April 27, 1983. On June 13, 1985 a Federal Register Notice announced BLM's intention to develop the San Rafael RMP, soliciting public participation in the process. A series of opportunities, though comment periods, public workshops, and similar meetings, ensured an appropriate level of public participation during the preparation of the RMP EIS between 1985 and 1991.

In February 1997, BLM conducted public and internal scoping to solicit input to identify the environmental issues and concerns associated with the proposed Ferron Natural Gas Project. A Notice of Intent (NOI) to prepare an EIS was published in the Federal Register on January 28, 1997. An amendment to the NOI was published in the Federal Register on February 3, 1998, which adjusted the western boundary of the South Area to the location evaluated in this EIS. The BLM prepared a scoping information packet and provided copies of it to federal, state, and local agencies; Native American groups; and members of the general public. In addition, the BLM conducted public

scoping meetings in Price, Utah; Castle Dale, Utah; and Salt Lake City, Utah on February 11, 12, and 13, 1997, respectively. The environmental issues identified are described in for the proposed are described in the Ferron EIS. A summary of the results of the scoping are maintained in the Price Field Office.

In addition, the Price Field Office issued a Notice of Intent (NOI) to revise the above land use plans in the Federal Register on November 7, 2001 initiating public scoping. This scoping included the No Action Alternative, which represents current management, as outlined in the 1983 Price River MFP and the 1991 San Rafael RMP as altered through amendment and policy since adoption of the records of decision for those plans.

A letter to the US Fish and Wildlife Service was mailed on December 9, 2005 and is included in Appendix D (Attachment 5).

Item 7: No for the following parcels: None

E. Interdisciplinary Analysis: Identify those team members conducting or participating in the preparation of this worksheet.

Name	Title	Resource Represented
Sue Burger	Physical Science Technician	Coal
Rebecca Doolittle	Geologist	Saleable & Locatable Minerals
Tom Gnojek	Outdoor Recreation Planner	Wilderness
Brad Higdon	Environmental Coordinator	NEPA
Karl Ivory	Range Management Specialist	T&E Plants/Weeds
Mike Leschin	Geologist/Paleontology	Paleontology
Mary Maddux	Natural Resource Specialist	Soils/ Native American Consultation
Mark Mackiewicz	Realty Specialist	Realty
Blaine Miller	Archaeologist	Cultural Resource
Mike Tweddell	Range Management Specialist	Wild Horses & Burros
David Waller	Wildlife Biologist	T&E Wildlife

F. Mitigation Measures: The following Lease Notices and/or Lease Stipulations should be applied to the identified, subsequent parcels

1. Lease Stipulation-Cultural Resources (WO-IM-2005-003); This stipulation shall be applied to all parcels.

"This lease may be found to contain historic properties and/or resources protected under the National Historic Preservation Act (NHPA), American Indian Religious Freedom Act, Native American Graves Protection and Repatriation Act, E.O. 13007, or other statutes and executive orders. The BLM will not approve any ground disturbing activities that may affect any such properties or resources until it completes its obligations under applicable requirements of the NHPA and other authorities. The BLM may require modification to exploration, or development proposals to protect such properties, or disapprove any activity that is likely to result in adverse effects that cannot be successfully avoided, minimized or mitigated.(WO-IM-2005-003)."

2. Lease Stipulation-Endangered Species Act Section 7 Consultation (WO-IM-2002-174): This stipulation shall be applied to all parcels.

The lease area may now or hereafter contain plants, animals, or their habitats determined to be threatened, endangered, or other special status species. BLM may recommend modifications to exploration and development proposals to further its conservation and management objective to avoid BLM-approved activity that will contribute to a need to list such a species or their habitat. BLM may require modifications to or disapprove proposed activity that is likely to result in jeopardy to the continued existence of a proposed or listed threatened or endangered species or result in the destruction or adverse modification of a designated or proposed critical habitat. BLM will not approve any ground-disturbing activity that may affect any such species or critical habitat until it completes its obligations under applicable requirements of the Endangered Species Act as amended, 16 U.S.C. §1531 et seq., including completion of any required procedure for conference or consultation.

3. Lease Notice-Price Field Office, - Under Regulation 43 CFR 3101.1-2 and terms of the lease (BLM Form 3100-11), the authorized officer may require reasonable measures to minimize adverse impacts to other resource values, land uses, and users not addressed in lease stipulations at the time operations are proposed. Such reasonable measures may include, but are not limited to, modification of siting or design of facilities, timing of operations, and specification of interim and final reclamation measures, which may require relocating proposed operations up to 200 meters, but not off the leasehold, and prohibiting surface disturbing activities for up to 60 days.

The lands within this lease may include areas not specifically addressed by lease stipulations that may contain special values, may be needed for special purposes, or may require special attention to prevent damage to surface and /or other resources. Possible special areas include steep slopes, surface waters, riparian areas, periods of frozen ground or saturated soils, proximity to highways or other existing rights-of-way, near occupied dwellings, mineral material sites, critical soils and water wells. Any surface use or occupancy within such special areas will be controlled. Appropriate modifications to impose restrictions will be made for the maintenance and operation of producing wells

Should be applied to **ALL** parcels

4. Lease Notice- Bald Eagle – T&E-01
Should be applied to the following parcel:
UT0206-198
5. Lease Notice – Mexican Spotted Owl (without designated critical habitat information) –T&E-06
Should be applied to parcels:
UT0206-205 and UT0206-213
6. Lease Notice – Southwestern Willow Flycatcher- T&E-07
Should be applied to the following parcels:
UT0206-169 UT0206-198
UT0206-171 UT0206-199
UT0206-173 UT0206-200

UT0206-175

7. Lease Notice – Burrowing Owl UT-LN-13
Should be applied to the following parcels:
UT0206-152, UT0206-170, and UT0206-173
8. Lease Notice—Endangered Fish of the Upper Colorado River Drainage Basin, T&E-03
Should be applied to the following parcel:

UT0206-169	UT0206-173	UT0206-199
UT0206-171	UT0206-175	UT0206-200
9. Lease Stipulation Endangered Fish Habitat, T&E-03
Should be applied to the following parcel:

UT0206-169	UT0206-173	UT0206-199
UT0206-171	UT0206-175	UT0206-200
UT0206-172	UT0206-198	
10. Lease Notice – Special Status Plants: Not Federally Listed – UT-LN-029
Should be applied to the following parcel:
UT0206-159
11. Lease Stipulations- Springs -UT-S-14
Should be applied to the following parcels:
UT0206-101, NWNENW, Sec. 27
UT0206-175, NWSESE and SENENE, Sec. 15
UT0206-177, NESENW, Sec. 28
UT0206-210, SESWSE, Sec. 14
12. Lease Stipulation – Springs – UT-S-43
Should be applied to the following parcels:
UT0206-100, Section 24, SWSE
UT0206-101, Section 25, NWNE
UT0206-151, Section 30, Public water reserve 107
UT0206-203, SWSWSW, Sec. 20, Public water reserve 107
UT0206-207, Public Water Reserve No. 107, sec. 30,
UT0206-210, located in the S2S2, Sec. 14 (Old Man Spring)
13. Lease Stipulation – Unconditional No Surface Occupancy, UT-S-120
Should be applied to the following parcels:
UT0206-171, portions of SWSW Sec. 5; NENESW, NWSE, SESE, portions of the W2SWNE, NENW, NWNESW, SENESW, N2SWSE NESE Sec. 8; portions of the NENE Sec. 17 (San Rafael River).
UT0206-172, lot 6, SESW, portions of lot 7; portions of lot 1, NENW, N2N2NE, SENENE Sec. 7 (San Rafael River)
UT0206-173, portions of S2SE, Sec. 10 (San Rafael River)
UT0206-175, and portions of E2NE Section 15 (San Rafael River)
UT0206-205, in portions of Sec. 27 and 34 (Three Canyon)
UT0206-206, in portions of E2SE, Sec. 33, (Three Canyon)

**UT0206-212, SESENE, NENESE, SENESE, Sec. 20, SWSWNW,
NWNWSW, Sec. 21**

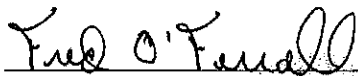
14. Lease Notice-Cultural Resources San Rafael Desert, UT-LN-47
Should be applied to the following parcels:
UT0206-100 UT0206-103 UT0206-106 UT0206-109
UT0206-101 UT0206-104 UT0206-107
UT0206-102 UT0206-105 UT0206-108
15. These parcels have existing rights that are in the form of rights-of-way. The lessee should be aware of these existing rights.

UT0206-151 Section 30, Public water reserve 107 NSO within 660 feet of Spring
UT0206-203 Public Water Reserve No. 107, sec. 20 SW $\frac{1}{4}$ SW $\frac{1}{4}$ NSO within 660 feet of spring
UT0206-207 Public Water Reserve No. 107, sec. 30, NSO within 660 feet of Spring

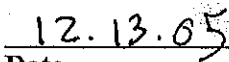
CONCLUSIONS

Conformance and Adequacy: Based on the review documented above, I conclude that the proposal to lease the following parcels conforms to the applicable land use plans. The existing NEPA documentation is adequate and constitutes BLM's compliance with the requirements of NEPA for the parcels listed below (62 parcels). Appendix A (Attachment 2) lists all parcels with their lease stipulations and lease notices.

UT0206-100	UT0206-149	UT0206-174	UT0206-198
UT0206-101	UT0206-150	UT0206-175	UT0206-199
UT0206-102	UT0206-151	UT0206-176	UT0206-200
UT0206-103	UT0206-152	UT0206-177	UT0206-202
UT0206-104	UT0206-153	UT0206-178	UT0206-203
UT0206-105	UT0206-154	UT0206-179	UT0206-205
UT0206-106	UT0206-155	UT0206-180	UT0206-206
UT0206-107	UT0206-156	UT0206-181	UT0206-207
UT0206-108	UT0206-157	UT0206-182	UT0206-208
UT0206-109	UT0206-158	UT0206-183	UT0206-209
UT0206-143	UT0206-159	UT0206-184	UT0206-210
UT0206-144	UT0206-169	UT0206-185	UT0206-211
UT0206-145	UT0206-170	UT0206-186	UT0206-212
UT0206-146	UT0206-171	UT0206-187	UT0206-213
UT0206-147	UT0206-172	UT0206-188	UT0206-214
UT0206-148	UT0206-173	UT0206-197	



Signature of the Responsible Official



Date

INTERDISCIPLINARY TEAM ANALYSIS RECORD CHECKLIST

3121-11-350
705 DEC 15 4:10:00

Project Title: February 2006 Oil and Gas Competitive Lease Sale

NEPA Log Number:

File/Serial Number:

Project Leader: Rebecca Doolittle

DETERMINATION OF STAFF: (Choose one of the following abbreviated options for the left column)

NP = not present in the area impacted by the proposed or alternative actions

NI = present, but not affected to a degree that detailed analysis is required

PI = present with potential for significant impact analyzed in detail in the EA; or identified in a DNA as requiring further analysis

NC = (DNAs only) actions and impacts not changed from those disclosed in the existing NEPA documents cited in Section C of the DNA form.

Determination	Resource	Rationale for Determination*	Signature	Date
CRITICAL ELEMENTS				
	Air Quality		<i>[Signature]</i>	12/13/05
NP	Areas of Critical Environmental Concern		<i>[Signature]</i>	12-12-05
NI	Cultural Resources	No Historic Properties Affected. eligible sites present, but not affected	<i>[Signature]</i>	12-12-05
NC	Environmental Justice		<i>[Signature]</i>	12/12/05
NP	Farmlands (Prime or Unique)		<i>[Signature]</i>	12/12/2005
NI	Floodplains		<i>[Signature]</i>	2005- Dec-12
NI	Invasive, Non-native Species		<i>[Signature]</i>	12-12-05
NI	Native American Religious Concerns	none identified	<i>[Signature]</i>	12-12-05
NI	Threatened, Endangered or Candidate Plant Species		<i>[Signature]</i>	12-12-05
NI	Threatened, Endangered or Candidate Animal Species	M50 designated critical habitat and potential M50 habitat	<i>[Signature]</i>	2005- Dec-12
NP	Wastes (hazardous or solid)		<i>[Signature]</i>	12/12/2005
NI	Water Quality (drinking/ground)		<i>[Signature]</i>	12/12/2005
NI	Wetlands/Riparian Zones		<i>[Signature]</i>	12-12-05
NC	Wild and Scenic Rivers		<i>[Signature]</i>	12/12/05

Determination	Resource	Rationale for Determination*	Signature	Date
NP	Wilderness		<i>[Signature]</i>	12/11/05
OTHER RESOURCES / CONCERNS**				
NI	Rangeland Health Standards and Guidelines		Ray Jensen	12/12/05
NI	Livestock Grazing		Ray Jensen	12/12/05
NI	Woodland / Forestry		Karl Jung	12-12-05
NI	Vegetation including Special Status Plant Species other than FWS candidate or listed species		Karl Jung	12-12-05
NI	Fish and Wildlife Including Special Status Species other than FWS candidate or listed species eg. Migratory birds.	Deer, elk, or antelope habitat present / deferred	<i>[Signature]</i>	2005 - Dec - 12
NI	Soils	Critical Soils	Ray Mathews	12-12-05
NI	Recreation		<i>[Signature]</i>	12-12-05
NI	Visual Resources		Tom Mott	12-12-05
NP	Geology / Mineral Resources/Energy Production		Bruce Denton	Dec. 12, 2005
NI	Paleontology	Surface is primarily eolian covered over formations with some scattered desert shrubs	Mike Stein	12/12/05
NI	Lands / Access		<i>[Signature]</i>	12/12/05
NI	Fuels / Fire Management		Hal M. Starn	12/12/05
NI	Socio-economics		<i>[Signature]</i>	12/12/05
NI	Wild Horses and Burros		Michael Zeller	12/12/05
NI	Wilderness characteristics	Inventory areas & proposals	<i>[Signature]</i>	12/12/05

FINAL REVIEW:

Reviewer Title	Signature	Date	Comments
NEPA / Environmental Coordinator	<i>[Signature]</i>	12/13/05	
Authorized Officer	Fred O'Fendall	12.13.05	

Delete the asterisks "*" in the checklist and these sentences:

*Rationale for Determination is required for all "NIs." Write issue statements for "PIs"

** Varies by specific location and BLM Field Office

**Addendum
Worksheet
Documentation of Land Use Plan Conformance and
Documentation of NEPA Adequacy (DNA)**

U.S. Department of the Interior
Utah Bureau of Land Management (BLM)

The signed CONCLUSION at the end of this worksheet is part of an interim step in the BLM's internal analysis process and does not constitute an appealable decision; however, it constitutes an administrative record to be provided as evidence in protest, appeals and legal procedures.

This addendum is supplemental to the DNA signed on December 12, 2005, by the Associate Field Manager, Price Field Office. The following items list the changes within the DNA. These changes are based on further analysis of the parcels proposed for the February 2006 oil and gas lease sale.

- **Insert the following paragraph on page 2 of the DNA, after the list of parcels that are recommended for deferral pending the IBLA decision:**

Of these 102 parcels, the following parcels are included in the "Utah Combined Hydrocarbon Leasing Regional Final Environmental Impact Statement" (EIS) Further analysis and review of the MFP and Combined Hydrocarbon EIS are necessary in order to determine if the parcels may be offered at a later date.

UT0206-069	UT0206-123	UT0206-167
UT0206-073	UT0206-124	UT0206-168
UT0206-074	UT0206-125	UT0206-190
UT0206-075	UT0206-126	UT0206-191
UT0206-076	UT0206-127	UT0206-192
UT0206-115	UT0206-128	UT0206-193
UT0206-116	UT0206-162	UT0206-194
UT0206-119	UT0206-163	UT0206-195
UT0206-120	UT0206-164	UT0206-216
UT0206-121	UT0206-165	
UT0206-122	UT0206-166	

- **Under Item C. Identify the applicable NEPA document(s) and other related documents that cover the proposed action, page 3 of DNA:**

Add the following reference to the list of NEPA documents that support this DNA:
"Utah Combined Hydrocarbon Leasing Regional Final Environmental Impact Statement", dated October 1984.

- **Item D. 3, Is existing analysis adequate in light of any new information or circumstances?**

1. Three parcels, UT0206-197, UT0206-201 and UT0206-204 were initially removed from the lease sale, because of a difference in leasing categories between the existing conditions, and the preferred alternative in the RMP draft EIS. However, the RMP map was interchanged with the existing condition map. The existing condition map shows that these parcels are located within a category 2 leasing area. This means the area is open for leasing with special conditions.

The RMP DEIS map shows that these parcels are located in a mix of leasing categories that appear as roughly north-south trending bands across the parcels. The leasing categories become more stringent from west (category 1, open for leasing with standard stipulations) to east (category 3, no surface occupancy) across the map. Thinking the RMP DEIS map was the existing condition map, and that some of the leasing categories were going from a category 1 (existing condition) to a category 2 (RMP EIS) the parcels were incorrectly deferred. The reverse is true. The leasing category is currently 2, with a leasing category 3 (no surface occupancy) in Three Canyon. We do not have justification to defer these parcels. Therefore, these parcels should be moved from the "No" section of in Item D.3, to the yes section.

2. The area of potential effect for the February 2006 oil and gas lease sale is identified as all the parcels offered for this sale and listed in the Cultural Resource Report.
3. On November 1, 2005, certified consultation letters (attached to the cultural staff report) were sent to the following Tribes: Southern Ute, Navajo, Shoshone-Wyoming, Hopi, Goshute, Zuni, Uintah and Ouray Ute, Ute Mountain Ute, Northwestern Band of the Shoshone, Shoshone-Bannock, and Paiute. The letters requested comments to be provided to the PFO within 30 days up receipt of the letter (December 15, 2005). The letter included an attachment of all the parcels (including those within the Price River MFP, and those that were mistakenly deferred) located within Price Field Office's area. We received two responses, one from the Goshute and one from the Paiute (these letters are attached). No concerns or issues raised in either letter. The 30-day comment period for the Tribes is over. Should the Price Field Office receive a letter before the lease sale from other tribes, we will notify the Utah State Office. However, until then the Price Field Office considers this case closed.

- **Item D. 4 (methodology and analytical approach),**

For the reason stated above under D. 3, parcels UT0206-197, UT0206-201 and UT0206-204, should be added in the "Yes" section, because they meet the following rationale.

The methodology and approach used in the Price District Oil and Gas Environmental Analysis Record, the 1988 EA Supplements, and the San Rafael RMP Final EIS are appropriate for the current proposed action because the methods of extraction, land

requirements for exploration and development, and potential impacts have not changed substantially since completion of these documents. The basic analysis assumptions included in these documents are still applicable to the current proposal. Coal bed methane production in Utah is essentially the same as conventional gas development as water production is injected below surface, therefore the methods of extraction, land requirements for exploration and development and potential impacts have not changed substantially.

- **Item D. 5 (Direct and indirect impacts)**

For the reason stated above under D. 3, parcels UT0206-197, UT0206-201 and UT0206-204, should be added in the "Yes" section, because they meet the following rationale.

The Price District Oil and Gas Environmental Analysis Record and San Rafael RMP Final EIS evaluated the direct and indirect impacts of oil and gas leasing per the current leasing categories, whether open to leasing, open to leasing with special stipulations or otherwise. As identified under criterion 3, no significant new information or circumstances have been identified which would render the existing analyses inadequate for leasing the above parcels. Nor have the existing resource conditions and other elements of the human environment changed substantially from those evaluated in the existing documents.

Coalbed methane production was not reasonably foreseeable when the planning documents were prepared. However, coalbed methane production in Utah is essentially the same as conventional gas development as water production is injected below surface; therefore there is no change to the existing resource conditions and values.

Natural gas production from tar sand deposits was not reasonably foreseeable when the planning documents were prepared. However, natural gas production from tar sands is essentially the same as conventional gas development; therefore there is no change to the existing resource conditions and values.

- **Item D. 6 (cumulative impacts)**

For the reason stated above under D. 3, parcels UT0206-197, UT0206-201 and UT0206-204, should be added in the "Yes" section, because they meet the following rationale.

The cumulative impacts of the oil and gas including coalbed methane development have been analyzed in Castlegate Coalbed Methane Project, Price Coalbed Methane Project, and Ferron Natural Gas Project EISs. The EISs update the development scenario addressed the 1988 EA Supplements. The Ferron Natural Gas Project EIS, the last to be completed, addressed the cumulative impacts of all three actions. Therefore the cumulative impacts of coalbed methane and conventional oil and gas activities have been analyzed in full.

Coalbed methane production was not reasonably foreseeable when the planning documents were prepared. However, coalbed methane production in Utah is essentially

the same as conventional gas development as water production is injected below surface; therefore there is no change to the existing resource conditions and values.

Natural gas production from tar sands is essentially the same as conventional natural gas production. Because the areas have been analyzed for surface disturbance related to conventional natural gas and coalbed methane production, the cumulative impacts have been analyzed in full.

- **The following information should be added to Part F. Mitigation Measures of the DNA to apply the following Lease Notices and/or Lease Stipulations to the new parcels.**

1. Lease Stipulation-Cultural Resources (WO-IM-2005-003); This stipulation shall be applied to all parcels.

"This lease may be found to contain historic properties and/or resources protected under the National Historic Preservation Act (NHPA), American Indian Religious Freedom Act, Native American Graves Protection and Repatriation Act, E.O. 13007, or other statutes and executive orders. The BLM will not approve any ground disturbing activities that may affect any such properties or resources until it completes its obligations under applicable requirements of the NHPA and other authorities. The BLM may require modification to exploration, or development proposals to protect such properties, or disapprove any activity that is likely to result in adverse effects that cannot be successfully avoided, minimized or mitigated.(WO-IM-2005-003)."

2. Lease Stipulation-Endangered Species Act Section 7 Consultation (WO-IM-2002-174); This stipulation shall be applied to all parcels.

The lease area may now or hereafter contain plants, animals, or their habitats determined to be threatened, endangered, or other special status species. BLM may recommend modifications to exploration and development proposals to further its conservation and management objective to avoid BLM-approved activity that will contribute to a need to list such a species or their habitat. BLM may require modifications to or disapprove proposed activity that is likely to result in jeopardy to the continued existence of a proposed or listed threatened or endangered species or result in the destruction or adverse modification of a designated or proposed critical habitat. BLM will not approve any ground-disturbing activity that may affect any such species or critical habitat until it completes its obligations under applicable requirements of the Endangered Species Act as amended, 16 U.S.C. §1531 et seq., including completion of any required procedure for conference or consultation.

3. Lease Notice-Price Field Office, - Under Regulation 43 CFR 3101.1-2 and terms of the lease (BLM Form 3100-11), the authorized officer may require reasonable measures to minimize adverse impacts to other resource values, land uses, and users not addressed in lease stipulations at the time operations are proposed. Such reasonable measures may include, but are not limited to, modification of siting or design of facilities, timing of operations, and specification of interim

and final reclamation measures, which may require relocating proposed operations up to 200 meters, but not off the leasehold, and prohibiting surface disturbing activities for up to 60 days.

The lands within this lease may include areas not specifically addressed by lease stipulations that may contain special values, may be needed for special purposes, or may require special attention to prevent damage to surface and /or other resources. Possible special areas include steep slopes, surface waters, riparian areas, periods of frozen ground or saturated soils, proximity to highways or other existing rights-of-way, near occupied dwellings, mineral material sites, critical soils and water wells. Any surface use or occupancy within such special areas will be controlled. Appropriate modifications to impose restrictions will be made for the maintenance and operation of producing wells.

Should be applied to UT0206-197, UT0206-201 and UT0206-204 parcels

4. Lease Notice- Bald Eagle – T&E-01

Should be applied to the following parcel:

UT0206-197 and UT0206-201

5. Lease Notice – Mexican Spotted Owl (without designated critical habitat information) –T&E-06

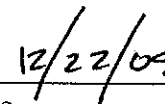
Should be applied to parcels:

UT0206-201 and UT0206-204


This addendum does not change the determination of NEPA adequacy and plan conformance that was recommended in the original DNA, signed on December 12, 2005.



Brad Higdon NEPA Coordinator



Date



Fred O'Ferrall, Associate Field Manager



Date

Note: The signed conclusion at the end of this worksheet is part of an interim step in the BLM's internal analysis process and does not constitute an appealable decision.

Attachment: Maps of parcels and leasing categories, and an Addendum to DNA's Attachment 2, Response letters from Tribes.